

PUBLIC DISCLOSURE

February 7, 2011

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**OptumHealth Bank, Inc.
Certificate Number: 57408**

**2525 Lake Park Boulevard, Suite #110
Salt Lake City, Utah 84120**

**Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, California 94105**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the CRA performance of **OptumHealth Bank, Inc. (OHB)** prepared by the **Federal Deposit Insurance Corporation**, the institution's supervisory agency, as of **February 7, 2011**. The agency evaluates performance in assessment areas (AA), as they are delineated by the institution, rather than individual branches. This evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 345.*

This institution elected to be evaluated under the CRA Strategic Plan Option (Plan). The Plan approved by the agency, sets forth goals for satisfactory performance.

INSTITUTION RATING

INSTITUTION'S CRA RATING: OHB is rated Satisfactory based on meeting each of the Plan goals for satisfactory performance. This rating represents a continuation of the Satisfactory rating received at the prior July 6, 2005, CRA Performance Evaluation.

The evaluation covered Plan years 2006 through 2010.

- OHB's performance met the goals established for "Satisfactory" performance for community development (CD) investments, service hours, and donations for Plan years 2006 through 2010.
- OHB has not received any complaints relating to its CRA performance.

In addition, no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

SCOPE OF EXAMINATION

OHB's performance included an analysis of the following performance criteria: OHB's CD investments; CD donations and grants; and CD services. In addition, OHB's response to complaints regarding its CRA performance was also reviewed.

For the current CRA evaluation period, OHB operated under two FDIC approved Plans. The first Plan, hereafter referred to as Plan A, was effective March 24, 2006, through December 30, 2008. The second Plan, hereafter referred to as Plan B, was effective January 1, 2009, through December 31, 2013. Plans A and B were approved based on OHB's annual performance. The current CRA evaluation review period included calendar years 2006 through 2010.

The CRA evaluation did not include a review of activities that occurred from July 7, 2005, through December 2005 since there were no additional activities for consideration.

Plans A and B provide measurable goals for meeting OHB's CRA obligations through CD investments and services. The primary focus of these goals is to address identified credit needs for affordable housing, and financial and health care education. OHB also provided CD services targeted to LMI individuals within its designated AA.

This evaluation relied upon the records and reports provided by OHB, publicly available financial information, demographic data, and information gathered as part of the evaluation process, including recent community contacts. The evaluation reflects OHB's performance since the previous CRA Performance Evaluation dated July 6, 2005. The evaluation was performed from OHB's sole office location in Salt Lake City, Utah. Goals for CD loans were not evaluated since they were not included in the Plans.

DESCRIPTION OF INSTITUTION

On March 3, 2008, Exante Bank, a Utah state-chartered industrial bank, officially changed its name to OHB and relocated to 2525 Lake Park Boulevard, Salt Lake City, Utah. OHB continues to operate as an industrial bank from this single, non-retail office located in Salt Lake County, which is within the Salt Lake City, Utah Metropolitan Statistical Area (MSA) #41620. OHB is a wholly-owned subsidiary of UnitedHealth Group.

As of December 31, 2010, OHB reported total assets of \$1.5 billion, total deposits of \$1.1 million, and total equity capital of \$188 million.

OHB does not solicit walk-in business, maintain branch offices or deposit-taking automatic teller machines, or offer a wide range of loan or deposit products. OHB's products are structured for the health care market and consist of the following:

- Consumer account debit card
- Health savings account
- Health care line of credit
- Health care account identification card
- Payment processing

OHB added the following new lending and deposit products subsequent to the effective dates of the Plans:

- Caretracker loans to medical offices that purchase software for electronic medical records,
- Medical equipment leasing, and
- Wealth management deposit accounts for beneficiaries' life insurance proceeds.

DESCRIPTION OF ASSESSMENT AREA

Demographic Information

OHB designated Salt Lake County as its AA for CD service opportunities, and designated the State of Utah as its AA for investments. The AAs defined in the Plans and approved by the FDIC meet regulatory requirements and do not arbitrarily exclude any LMI areas.

According to the 2000 U.S. Census, the State of Utah contains 496 census tracts and Salt Lake County contains 193 census tracts.

Table 1 shows selected population, business, and other demographic characteristics for Salt Lake County.

Table 1 Salt Lake County Demographics					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts)	193	2.6	22.3	46.6	28.5
Population by Geography	898,387	0.9	23.6	48.8	26.8
Owner-Occupied Housing by Geography	203,690	0.2	17.4	51.9	30.5
Business by Geography	109,522	7.7	22.0	41.1	29.3
Farms by Geography	1,591	4.3	17.8	43.7	34.2
Family Distribution by Income Level	215,864	17.0	19.9	24.9	38.2
Distribution of LMI Families throughout AA	79,691	1.6	35.8	49.3	13.4
Median Family Income(MFI)		54,586	Median Housing Value		165,698
Housing and Urban Development (HUD) Adjusted MFI for 2009		67,800	4th Quarter 2010		
Households Below Poverty Level		7.7%	Unemployment Rate		6.8 %

Source: 2000 U.S. Census, 2009 HUD updated MFI, 2010 D&B, and Bureau of Labor Statistics

Economy

The Utah Department of Workforce Services listed health care providers as the largest employers in 2009, with over 20,000 employees. Next to follow were the State of Utah, Wal-Mart, and the two major higher education institutions: Brigham Young University and the University of Utah. According to the Bureau of Labor Statistics, the December 2010 unemployment rate for Salt Lake County was 6.8 percent, which is well below the national average of 9 percent reported in December 2010.

Competitive Environment

According to the June 30, 2010, FDIC Summary of Deposits, there were a total of 74 financial institutions with offices or branches in the State of Utah, of which 50 were located in Salt Lake County. OHB ranks 20th in the State of Utah deposit market share, holding 0.4 percent of the state's \$271 billion in total deposits. OHB ranks 18th in Salt Lake County, holding 0.4 percent of the county's \$239 billion in total deposits.

Institution Identified Community Credit Needs

OHB achieved its Plan objectives by focusing on affordable housing, health care-based initiatives; financial education with an emphasis on LMI areas or individuals; and providing technical assistance to community-based organizations. Grants and donations were also considered for programs and non-profit partnership organizations that deliver CD services to LMI individuals.

Community Contacts

Information obtained from community contacts is used to evaluate an institution's CRA performance. Two recent community contact interviews with non-profit organizations located in Salt Lake County were reviewed as part of this evaluation. The contacts stated that local financial institutions have a strong involvement with non-profit organizations. One contact indentified a need for affordable housing and for financial institutions to work closer with community organizations that provide affordable financing. Both contacts stated that considering the current financial environment, the overall banking and credit needs of the community were being met by local financial institutions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE IN THE STATE OF UTAH

OHB's CRA performance depicts a satisfactory record of helping to meet the credit needs of its AA, as outlined by the Plans, in a manner consistent with its resources and capabilities. The following covers CRA performance for calendar years 2006 through 2010, under each year's respective Plan goals.

Community Development Investments

OHB has achieved its goals for a satisfactory level of CD investments. The measurable goals for investments are based on a percentage of OHB's total average assets for the year. OHB's average assets for each Plan year are calculated using the amounts from line 9 of Schedule RC-K from OHB's quarterly Report of Condition and Income (Call Report). Table 2 reflects OHB's CD investments and goals achieved for each Plan year.

Table 2 Cumulative Community Development Investments					
Plan Year	Institution Established Goals	Institution Performance			Plan Goals Met
	Satisfactory	Investments Total (000s)	Average Assets (000s)	Actual Performance	
2006	1.00%	5,135	253,102	2.03%	Satisfactory
2007	1.05%	7,510	520,422	1.44%	Satisfactory
2008	1.10%	12,320	771,447	1.60%	Satisfactory
2009	1.00%	15,415	1,048,675	1.47%	Satisfactory
2010	1.00%	16,352	1,365,082	1.20%	Satisfactory

Source: OHB records and OHB Plans A and B.

The established minimum goals for a "Satisfactory" rating were met through CD investments for Plan years 2006 through 2010.

As reported by community contacts used for this CRA evaluation, organizations focusing on affordable housing are among those in greatest need for funding.

OHB has invested funds in organizations that meet these identified credit needs. Table 3 itemizes by Plan year, the organizations and investment funds that received the benefit of OHB's investment activities.

Table 3 Community Development Investments					
Community Development Activity Investment (000s)	Plan Year				
	2006	2007	2008	2009	2010
Affordable Housing Bonds	1,435	3,435	3,485	3,170	5,205
Mortgage-Backed Securities	3,191	3,555	8,316	11,715	8,608
CD Loan Pool Commitment	472	457	457	428	349
CD Loan Pool Funded	28	48	47	72	155
CRA Qualified Mutual Fund	-	-	-	-	2,000
CRA Donations	9	15	15	30	35
TOTAL	5,135	7,510	12,320	15,415	16,352

Source: OHB records

The CD investments in Table 3 support affordable housing and mortgage financing programs to LMI individuals in the institution's designated AA in the State of Utah. The investments included a local community reinvestment corporation, state housing bonds as well as mortgage-backed securities, with underlying collateral in residential real estate loans, extended to LMI individuals.

Community Development Grants and Donations

OHB achieved its goals for a satisfactory level of CD grants and donations to qualified organizations. OHB's Plans established an "up to dollar amount" and did not set a minimum amount to meet satisfactory goals for each Plan year. In plan years 2006 - 2010, OHB met the institution's established goals for "Satisfactory" performance. Table 4 depicts the performance for each year.

Table 4 Community Development Grants and Donations			
Plan Year	Institution Established Goals	Institution Performance	Plan Goal Met
	Satisfactory	Grant/Donation Total	
2006	Up to \$15,000	\$8,725.00	Satisfactory
2007	Up to \$15,000	\$15,500	Satisfactory
2008	Up to \$15,000	\$15,000	Satisfactory
2009	Up to \$30,000	\$30,000	Satisfactory
2010	Up to \$35,000	\$35,480	Satisfactory

Source: OHB records and OHB Plans A and B.

During the 5 year review period, OHB donated a total of \$104,705 to 21 different qualified organizations that provide CD services and affordable housing to LMI individuals. Among these organizations, there were several that received cumulative donations of \$10,000 or more over the 5 year examination period.

Health care initiative sponsorship – Donations totaling \$33,350 (31.8 percent of the total donations of \$104,705) were provided to 10 organizations focusing on health care services and other initiatives to benefit medical research for LMI individuals in the AA.

Community outreach sponsorship – Donations totaling \$30,000 (28.7 percent of the total donations of \$104,705) were provided to 2 organizations that focus on underserved youth and CD, with a particular emphasis on services that benefit LMI children.

Financial education sponsorship – Donations totaling \$20,690 (19.8 percent of the total donations of \$104,705) were provided to fund a non-profit organization. The organization focuses on student education including workforce readiness, entrepreneurship, and financial education through experimental, hands-on programs.

CD sponsorships – Donations totaling \$10,000 (9.5 percent of the total donations of \$104,705) were granted to help fund a non-profit organization that focuses on affordable housing for LMI individuals, and financing small businesses.

Community Development Services

OHB achieved its goals established for “Satisfactory” performance for CD services for Plan years 2006 through 2010. Table 5 reflects OHB’s cumulative total for CD service hours of 2,994 and the goals achieved for each Plan year.

Table 5 Community Development Service Hours			
	Institution Established Goals	Institution Performance	Plan Goal Met
Plan Year	Satisfactory	Qualified Service Hours	
2006	280	381	Satisfactory
2007	290	447	Satisfactory
2008	300	617.5	Satisfactory
2009	310	677.5	Satisfactory
2010	320	871.5	Satisfactory

Source: OHB records and OHB Plans A and B.

OHB personnel are responsive to the local community by providing the following services that may not always be available through federal and/or state funding or other non-profit activities. Table 6 describes the cumulative CD service activities.

Table 6 Qualified Community Development Service Hours						
Qualifying Services	Activities	2006	2007	2008	2009	2010
Financial Education for Students	Provide financial education training to LMI students	252	396	506	379	567
Board or Committee Service to Qualifying Entities	Board and committee service to entities engaged in CD activities	129	51	40.5	66.5	60
Neighborhood and Community Outreach	Provide assistance and essential services to LMI individuals through non-profit organizations in various areas such as after school programs, shelter, and other qualified services	0	0	28	121.5	160
Health care assistance and initiatives	Provide a variety of qualified funding and services	0	0	43	110.5	84.5
TOTAL OVERALL HOURS		381	447	617.5	677.5	871.5

Source: OHB records

As demonstrated in Table 6, OHB responded to an identified need for financial education training for LMI students. OHB's officers and employees provided training to students at various Title 1 schools through a local financial education program which is intended to provide a more secure financial foundation to LMI students. The program has been offered in schools for many years and covers numerous topics such as business, economics, and the free enterprise system. OHB employees contribute to this program by providing their time and financial expertise to teach students and serve as board members.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

APPENDIX A

SCOPE OF EXAMINATION

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED		January 1, 2006 through December 31, 2010	
FINANCIAL INSTITUTION OptumHealth Bank Salt Lake City, Utah		PRODUCTS REVIEWED CD Investments, Grants, and Services	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Salt Lake County (services) The state of Utah (investments)	Full-scope On-site	Main Office	NA